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On the Department of Energy's Draft Environmental
Impact Statement for a Geologic Repository for the
Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste
at Yucca Mountain, Nye County, Nevada

January 11, 2000

Thank you for the opportunity to testify regarding the Department of Energy's Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain.

I am the executive director of the Los Angeles chapter of Physicians for Social Responsibility. I also sit on the advisory panel, organized by University of California President Richard Atkinson for Governor Gray Davis, on finding disposal strategies for California's low-level radioactive waste. Physicians for Social Responsibility, Los Angeles represents individuals throughout Los Angeles, Orange, Riverside and San Bernardino counties, areas in which vehicles transporting radioactive waste will travel if the Yucca Mountain repository is approved.

1... The Draft Environmental Impact Statement fails to serve the public in a number of ways. I will address how the Draft EIS falls shy of adequately considering the impacts of transporting the waste materials to Yucca Mountain. The DOE notes that the region of influence for public health and safety along existing transportation routes is a half mile from the center line of transportation rights-of-way for non-accident conditions, and 50 miles for accident conditions (p.3-98). However, the DEIS neither shows specific routes outside of Nevada to be used to transport waste materials, nor addresses the baseline conditions along those routes. In order to do a complete impact analysis, the DOE should map specific routes and establish baseline conditions along those routes, as well as clearly and honestly identify potential impacts along those routes.

One can look at a map of the current locations of radioactive waste to see that this highly irradiated waste will need to travel through 43 states—past the homes, workplaces, and hospitals of 50 million Americans to get to Yucca Mountain. Those 50 million Americans have a right to be informed about the risks associated with transporting nuclear waste and the impacts on public health and the environment that will occur from the transportation.

The DEIS should clearly and accurately characterize the risks

- 1 cont. involved along the transportation routes, and it should use the most current information available to do so. Further, it should include site-specific data to show the effects of accidents in highly populated areas or areas where it would be difficult to retrieve a leaking cask (such as ravines and rivers).
- 2 The DEIS bases its conclusions about the impacts of nuclear waste transportation on an outdated and incomplete study (the Modal Study) done in 1987 by Lawrence Livermore Labs for the Nuclear Regulatory Commission (NRC). The NRC itself has recognized the need to update and expand the Modal Study, and has thus contracted with Sandia National Labs to revise the 1987 study. However, this revision ("Modal II") will not be completed until 2003—two years after a final decision will be made about Yucca Mountain.
- 3 The DEIS fails to address the fact that the number of shipments and the amount of radioactive material that will be shipped is unprecedented in world history. About 90% of the volume would be spent fuel from nuclear power plants, and virtually none of this type of material has ever been shipped before. The DOE knows which routes it will use to transport radioactive waste to Yucca Mountain. Specific routes were needed to run the computer analysis programs (HIGHWAY and INTERLINE) to complete the DEIS. The DOE should name those routes in the DEIS. The DOE's argument that the routes might change or that states may designate alternate routes is not an acceptable justification for refusing to include the specific routes used to analyze potential impacts in the DEIS.
- 4 The DEIS does not examine what emergency response personnel training and equipment would be needed in all of the communities along the transportation routes and what the specific impacts of a transportation accident would be. Many local communities lack the special equipment and training necessary to respond to a radiological accident. Further, many hospitals do not have isolation rooms for radioactively contaminated victims.
- 5 The 50 million Americans that will be affected by this unprecedented transportation campaign have a right to be informed about the risks they will face if Yucca Mountain is approved as a repository for nuclear waste. Doctors, nurses, and emergency responders have a right to know what dangers their communities will be exposed to if this campaign is allowed to happen. The DOE has a responsibility to the people of America to honestly, clearly, and accurately characterize the human health risks involved with nuclear waste transportation.

Thank you once again for the opportunity to speak to you today.